

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

FILED  
CLERK'S OFFICE  
DECEMBER 12 2005  
DISTRICT OF MASS

**BEGASHAW AYELE, PRO SE**

**Plaintiff**

**vs**

**COGNISIA SECURITY, INC.**

**Defendant**

**Civ. Action NO. 12217PBS**

**MOTION FOR PERMISSION TO USE ONE OF THE COURT'S CONFERENCE ROOM  
FOR TAKING DEPOSITION FROM DEFENDANT COGNISIA SECURITY INC, ET AL.**

Plaintiff for the above referenced civil case respectfully request this court to use one of the conference room to use for taking deposition from two individuals of defendant Cognisia Security Inc.'s management team and two other nonparty members who may have knowledge as to the company's policies and practices.

Before advancing this motion to this court, plaintiff had a plan to take such deposition at any of the public library but as the deposition will be taken by tape recorder, it was discovered that other background noise from the public will not make the recording as clear as expected. For this reason alone plaintiff had requested defense counsel if it was possible to use its office where I was deposed by defendant earlier. By letter dated April 20, 2005 **EXHIBIT - A** counsel for defendant agreed but in another time, and by letter of May 24, 2005 **EXHIBIT -B**, I was informed that the place available for deposition was in New York city. Plaintiff can *not*

travel to new York City for satisfying defendant's wish in causing pain on the part of the plaintiff be it in terms of time or cost.

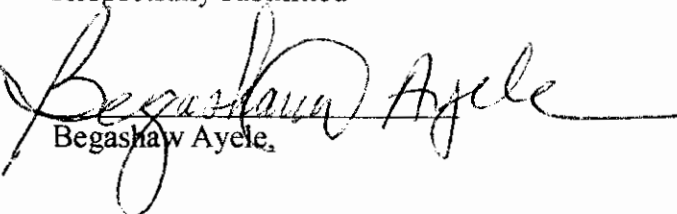
Plaintiff seek two days, (but will make it one day only if possible) of time to use one of the court's conference room to seek an answer that defendant had not supplied proper answer in discovery phase (request for production of documents and interrogatories). This request to use the court's room should not be seen as uncommon/unusual request since in similar circumstance in approximately in 1996, Judge Robert Keeton, in another case had permitted me when I was not willing to go to the defendant's law firm due to animosity developed from the litigation.

At this time, therefor, plaintiff seek the permission of the court to use the court's room but will inform the clerk of the court as to when I will use it and make other arrangement with the parties involved. In the alternate, and if the court has any reason not to grant plaintiff's request to use the court room, this request should be construed as a "motion to compel defendant to attend the deposition at plaintiff's apartment" where there is no chair, drinking water or coffee that plaintiff can extend my generosity due to my poverty. .

Dated

5/30/2005

Respectfully submitted

  
Begashaw Ayele

### CERTIFICATE OF SERVICES

This certify that the plaintiff's motion for using the court room for deposition was mailed to defendant to the following address: Bronwyn L. Roberts, counsel for defendant Cognsia Security Inc., at Duane Morris LLP 470 Atlantic Avenue suite 500 Boston MA 02210.

Sincerely

  
Begashaw Ayele